



LOWEY DANNENBERG

July 22, 2020

SO ORDERED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: JUL 23 2020

VIA ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Sonterra Master Capital Fund Ltd. et al. v. UBS AG et al.*, No. 15-cv-5844 (GBD) (SLC)

Dear Judge Daniels:

As counsel for Plaintiffs, we write with the consent of all parties to respectfully request an agreed, one-week adjustment to the previously endorsed schedule governing Plaintiffs' forthcoming amended complaint. *See* ECF No. 471.

In order to further the interests of judicial economy and efficiency, the parties have agreed that on or before July 31, 2020, Plaintiffs will provide Defendants with a copy of their proposed Second Amended Complaint so that Defendants can consider whether they will consent to or oppose the proposed amendment. Defendants will advise Plaintiffs whether they consent to or oppose the proposed amendment by noon Eastern time on August 14, 2020, and whether they believe there are any issues that require the Court's intervention. Nothing in this process shall constitute a waiver of any defense that may be available to Defendants, including based on lack of personal jurisdiction or improper venue.

If Defendants consent to the amendment, briefing shall proceed as follows:

- Plaintiffs shall file the Second Amended Complaint no later than **August 17, 2020**
- Defendants shall file any motion to dismiss papers by **October 9, 2020**
- Plaintiffs shall file any opposition papers by **November 30, 2020**
- Defendants shall file any reply papers by **December 21, 2020**

If Defendants oppose the amendment, briefing shall proceed as follows:

- Plaintiffs shall file a motion for leave to amend no later than **August 21, 2020**
- Defendants will file any opposition brief on or before **October 16, 2020**
- Plaintiffs will file any reply papers by **November 16, 2020**

We respectfully request that the Court endorse the proposed agreed adjustment to the schedule, which is intended to resume this litigation promptly while still providing necessary flexibility



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during the ongoing coronavirus pandemic. This is Plaintiffs' first request for an extension with respect to this schedule.

Respectfully submitted,

/s/ Vincent Briganti  
Vincent Briganti

cc: Counsel of Record (via ECF)